



GRAYMONT



October 12, 2021

Via Electronic Submission

Environmental Quality Board
Rachel Carson State Office Building, 16th Floor
400 Market Street
Harrisburg, PA 17101-2301
(RegComments@pa.gov)

RE: Comments on Proposed Rulemaking
Additional RACT Requirements for Major Sources of NO_x and VOC for the 2015 Ozone
NAAQS (#7-561)

Dear Sir or Madam:

Graymont (PA) Inc. (Graymont) is submitting this letter to provide comments to the Pennsylvania Department of Environmental Protection (PADEP) and the Environmental Quality Board (EQB) regarding PADEP's proposed rule titled *Additional RACT Requirements for Major Sources of NO_x and VOC for the 2015 Ozone NAAQS* ("Proposed Rule"). The proposed rule was published in the Pennsylvania Bulletin on August 7, 2021 (51 Pa.B. 4333). Graymont is submitting these comments on the presumptive RACT limitations for lime kilns electronically, in accordance with the instructions listed in the Bulletin, on or prior to October 12, 2021.

Graymont operates a lime manufacturing plant in Centre County, Pennsylvania ("Pleasant Gap Plant"). The Pleasant Gap Plant, which consists of three lime kilns, was subject to the RACT II provisions established in Title 25, Chapter 129, Sections 96 through 100 of the Pennsylvania Code (25 PA Code §129.96 – 129.100). As part of the alternative RACT proposal process (i.e., "case-by-case" RACT analysis per 25 PA Code §129.99), PADEP established numerical NO_x emissions limitations for Kiln 6 and Kiln 7 at the Pleasant Gap Plant. Graymont worked through an extensive technical review with PADEP that ultimately culminated in the establishment of these limits.

In the current Proposed Rule, PADEP outlines a presumptive RACT limitation of 4.6 pounds of NO_x per ton of lime produced on a 30-operating day rolling average for any lime kiln operating in the Commonwealth. As noted in the Bulletin, the prior draft version of the Proposed Rule, which went through advisory committee meetings and Citizens Advisory Council (CAC) meetings, identified the following specific 30-operating day NO_x limits for Graymont Pleasant Gap Plant under proposed 25 Pa Code §129.112(j):

- 205 pounds per hour (lb/hr) for Kiln 6;



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- 179 lb/hr for Kiln 7; and
- 7.9 lb/hr for Kiln 8.

Per the Bulletin notice, the Proposed Rule was revised to the single, uniform limitation since:

“when expressed as pounds of NO_x per ton of lime rather than pounds of NO_x per hour, the applicable operating permit plant-specific lime kiln emission rates for the three lime kilns in paragraph (1) – (3) comply with the presumptive RACT emissions limitation in paragraph (4) of 4.6 pounds of NO_x per ton of lime produced.”

As shown in the following table, Graymont confirms the agency assertion that the already-established emissions limitations for Kilns 6, 7 and 8 are effectively more restrictive than the current industry-wide rate in the Proposed Rule. As written, Graymont interprets the Proposed Rule as not superseding the already-established NO_x emissions limitations contained in the air permits for the three kilns. The Proposed Rule rather adds a separate additional emission limit for which to track compliance and, in this case, the limitation would be one less stringent than that already navigated by Graymont.

Pleasant Gap Kiln	Prior Rule NO _x Emission Rate (lb/hr, 30-operating day rolling average)	Nominal Kiln Capacity (tons per day of lime)	Effective NO _x Emission Rate (lb NO _x /ton lime, 30-operating day rolling average)	Difference from Proposed Rule Uniform Limit of 4.6 lb NO _x /ton lime
Kiln 6 (rotary kiln) ¹	205	1,200	4.1	-11%
Kiln 7 (rotary kiln) ¹	179	1,050	4.1	-11%
Kiln 8 (vertical kiln) ²	7.9	660	0.3	-94%

1. The Kiln 6 and Kiln 7 lb/hr limitations are based on those established during RACT II as incorporated into the Plant’s Title V operating permit.
2. The Kiln 8 lb/hr limitation is based on Best Available Technology (BAT) as incorporated into a Plan Approval (pending incorporation into the Title V operating permit).

Further complicating the matter is that Graymont relies on Continuous Emissions Monitoring Systems (CEMS) for demonstrating compliance with the current numerical NO_x emissions limitations. By adding a proposed lb/ton of lime limitation, Graymont would have to perform substantial system changes to incorporate live production data into the well-established CEMS data management system. The system’s underlying algorithms would need to be revised to account for the new limitation while retaining mechanisms for demonstrating compliance with the existing limits as well. These material modifications to the CEMS and its data management systems would not result in any environmental benefit.

Based on the above facts and concerns, Graymont requests that PADEP update the proposed rule to once again include the specific lb/hr, 30-operating day rolling average numerical limits associated with Graymont’s Kiln 6, Kiln 7, and Kiln 8. By doing so, PADEP will 1) help alleviate unnecessary burden on Graymont that results in no environmental benefit, and 2) more directly, and consistently, enforce more stringent NO_x emissions levels than the current proposal and in turn help achieve the goal of the regulation.



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We appreciate the Department's consideration and resolution of these comments. If you have any questions concerning this letter, please contact me at (814) 353-2106.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Maitland". The signature is fluid and cursive, with a large initial "J" and "M".

John A. Maitland
Director, Corporate Affairs, Environment & Sustainability North America